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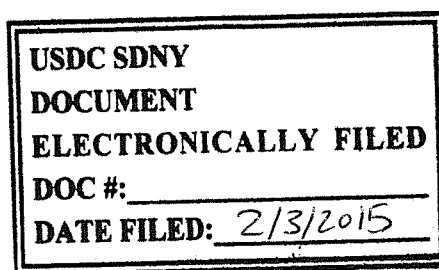
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January 30, 2015

VIA ECF

Hon. Analisa Torres
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007-1312



**Re: Rosibel Ringling v. 61st Street Service Corporation, The Trustees of
Columbia University in the City of New York and Marissa Harvey,
Individually, S.D.N.Y. 14-CV-2257 (AT)(SN)**

Dear Judge Torres:

This firm represents Defendants, 61st Street Service Corp. ("Service Corp.") and The Trustees of Columbia University in the City of New York ("Columbia University"), in connection with the above-referenced matter. Pursuant to the Case Management Plan and Scheduling Order (Docket No. 40), discovery is scheduled to conclude on February 27, 2015. We write jointly with counsel for Defendant Marissa Harvey to respectfully request that the current discovery deadline be extended to May 8, 2015, to allow the parties to complete depositions and remaining document discovery. Accordingly, enclosed please find a proposed Revised Case Management Plan signed by Defendants.

The parties have made significant progress in discovery to date. The parties have exchanged initial document and interrogatory requests as well as initial responses to same. The parties have conferred regarding a schedule for depositions and have agreed upon the following available dates for the depositions of Plaintiff: February 26 and March 11. Confirmation of the dates for Plaintiff's deposition is contingent upon receipt by Defendants of all outstanding document production from Plaintiff, as well as documents from third parties. We have also

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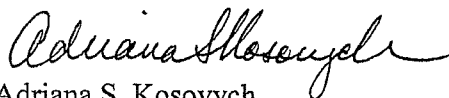
offered March 31 and April 2 as available dates for the deposition of Ms. Harvey and a FRCP 30(b)(6) witness. Plaintiff has rejected these dates as she does not consent to an extension of the the discovery deadline beyond March 27, 2015.

Defendants anticipate that the parties may need to serve follow-up document requests, interrogatories and/or requests for admission at the conclusion of depositions. Non-party witnesses may also need to be deposed. In addition, counsel for Ms. Harvey and counsel for Service Corp. and Columbia University are each scheduled to be away for vacation from February 14-21, 2015 and April 9-20, 2015, respectively. For these reasons, Defendants seek an extension of the discovery deadline to May 8, 2015.

This is the Defendants' first request for an extension of the discovery deadline in this case.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,


Adriana S. Kosovych

Enclosure


cc: Marjorie Mesidor, Esq.
Attorneys for Plaintiff

Marc B. Zimmerman, Esq.
Attorneys for Marissa Harvey

Defendants' request is GRANTED. The deadline for fact discovery is EXTENDED to **May 8, 2015**.

SO ORDERED.

Dated: February 3, 2015
New York, New York



ANALISA TORRES
United States District Judge